

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262
THIS DOCUMENT RELATES TO:	Master File No. 1:11-md-2262- NRB
	ECF Case
<i>City of Riverside v. Bank of Am. Corp. et al.</i>	No. 13-cv-0597
<i>Cnty. of San Mateo v. Bank of Am. Corp. et al.</i>	No. 13-cv-0625
<i>E. Bay Mun. Util. Dist. v. Bank of Am. Corp. et al.</i>	No. 13-cv-0626
<i>City of Richmond v. Bank of Am. Corp. et al.</i>	No. 13-cv-0627
<i>Cnty. of San Diego v. Bank of Am. Corp. et al.</i>	No. 13-cv-0667
<i>Regents of the Univ. of Cal. v. Bank of Am. Corp. et al.</i>	No. 13-cv-5186
<i>Cnty. of Sonoma v. Bank of Am. Corp. et al.</i>	No. 13-cv-5187
<i>San Diego Ass'n of Gov'ts v. Bank of Am. Corp. et al.</i>	No. 13-cv-5221
<i>Cnty. of Sacramento v. Bank of Am. Corp. et al.</i>	No. 13-cv-5569
<i>Cnty. of Mendocino v. Bank of Am. Corp. et al.</i>	No. 13-cv-8644
<i>Amabile et al. v. Bank of Am. Corp. et al.</i>	No. 13-cv-1700
<i>Maragos v. Bank of Am. Corp. et al.</i>	No. 13-cv-2297
<i>Federal Home Loan Mortg. Corp. v. Bank of Am. Corp. et al.</i>	No. 13-cv-3952
<i>City of Houston v. Bank of Am. Corp. et al.</i>	No. 13-cv-5616
<i>The Charles Schwab Corp. et al. v. Bank of Am. Corp. et al.</i>	No. 13-cv-7005
<i>Nat'l Credit Union Admin. Bd. v. Credit Suisse Grp. AG et al.</i>	No. 13-cv-7394
<i>Triaxx Prime CDO 2006-1 Ltd. et al. v. Bank of Am. Corp. et al.</i>	No. 14-cv-0146
<i>Federal Deposit Ins. Corp. v. Bank of America Corp. et al.</i>	No. 14-cv-1757
<i>Bay Area Toll Authority v. Bank of Am. Corp. et al.</i>	No. 14-cv-3094

**DECLARATION OF OSAMU TAKASHIMA IN SUPPORT OF  
THE NORINCHUKIN BANK'S MOTION TO DISMISS  
THE DIRECT ACTIONS FOR LACK OF PERSONAL JURISDICTION**

I, OSAMU TAKASHIMA, declare the following:

1. I am currently a General Manager in the Legal Division of The Norinchukin Bank ("Norinchukin") and submit this declaration in support of Norinchukin's motion to dismiss the above-captioned actions for lack of personal jurisdiction. The facts stated herein are true to the

best of my knowledge based on records maintained by Norinchukin in its regular course of business. Unless otherwise noted, the facts set forth in this declaration describe Norinchukin's business during the time period from January 1, 2006 through March 31, 2014.

2. Norinchukin is a Japanese financial institution that was incorporated under the laws of Japan.

3. Norinchukin's headquarters was and is located at 1-13-2, Yurakucho, Chiyoda-ku, Tokyo 100-8420, Japan.

4. Norinchukin had only one branch office in the United States. That branch was licensed and located in New York, New York (the "New York Branch"). There are no Norinchukin offices in any other state.

5. Norinchukin was a panel bank on the Dollar LIBOR panel that was administered by the British Bankers' Association (the "BBA").

6. All Norinchukin employees and supervisors responsible for submitting Dollar LIBOR rates to the BBA worked in England. The New York Branch did not contribute to submitting Dollar LIBOR rates.

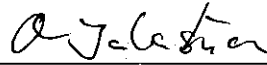
7. All witnesses and documents potentially relevant to the plaintiffs' allegations were located in England or Japan.

8. For each of the fiscal years ended March 31, 2011, 2012, 2013 and 2014, less than 0.6% of Norinchukin's worldwide income came from its New York Branch operations.

9. Throughout that same period, Norinchukin's New York Branch had fewer than 70 employees out of more than 3,100 Norinchukin employees worldwide.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 5th day of November, 2014 in Tokyo, Japan.

A handwritten signature in black ink, appearing to read "Osamu Takashima", written over a horizontal line.

Osamu Takashima

